

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HERMINE BYFIELD

Plaintiff,

vs.

HEALTHCARE REVENUE RECOVERY
GROUP, LLC, et al.,

Defendants.

CIVIL ACTION
NO. 2:18-cv-00243-PBT

**DEFENDANT, HEALTHCARE REVENUE RECOVERY GROUP, LLC'S
MOTION FOR SUMMARY JUDGMENT**

Defendant, Healthcare Revenue Recovery Group, LLC (“HRRG”), by and through its attorneys, Marks, O'Neill, O'Brien, Doherty & Kelly, P.C., hereby moves for summary judgment in its favor pursuant to Fed. R. Civ. P. 56, and in support thereof avers as follows:

1. Plaintiff, Hermine Byfield, initiated this action by filing a Complaint against HRRG on January 19, 2018. Complaint (ECF 1).
2. Plaintiff's claims against HRRG stem from a single alleged violation of the Fair Debt Collection Practices Act arising from HRRG's mailing of a letter to Plaintiff, dated August 3, 2017, seeking to collect an unpaid debt on behalf of a medical provider. *See id.*
3. HRRG filed an Answer to the Complaint with Affirmative Defenses on March 20, 2018. HRRG Answer (ECF 6).
4. The pleadings and fact discovery are closed. *See* Order, Aug. 17, 2021 (ECF 46).
5. HRRG now moves for the entry of summary judgment pursuant to Federal Rule of Civil Procedure 56. In support, HRRG files contemporaneously with this Motion a Statement of

Undisputed Material Facts and Memorandum of Law, which are incorporated by reference as if fully set forth herein.

WHEREFORE, Defendant, Healthcare Revenue Recovery Group, LLC, respectfully requests that this Honorable Court enter summary judgment in its favor on all Counts asserted in Plaintiff's Complaint, pursuant to Fed. R. Civ. P. 56, and dismiss Plaintiff's Complaint as against HRRG with prejudice.

**MARKS, O'NEILL, O'BRIEN,
DOHERTY & KELLY, P.C.**

/s/ Cecil J. Jones, Esquire

Cecil J. Jones, Esquire (Atty ID 205952)

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Date: December 14, 2021